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Counsel for Plaintiffs and the Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

FRANKLYN AJAYE, MING-CHUN WU
CHEN, TZU-CHIAO CHEN, RAYNA
RUSENKO, TITI TRAN, BÓRIS
ZINGERMAN, and GALINA
ZINGERMAN, on behalf of themselves
and all others similarly situated,

Case No. C07-5911 CRB

**STIPULATION RE EXTENSION
OF TIME FOR DEFENDANT ALL
NIPPON AIRWAYS CO., LTD. TO
RESPOND TO COMPLAINT**

Plaintiffs,

vs.

AIR NEW ZEALAND, LTD., ALL
NIPPON AIRWAYS CO., LTD., CHINA
AIRLINES, LTD., EVA AIRWAYS
CORPORATION, JAPAN AIRLINES
CORPORATION, NORTHWEST
AIRLINES CORPORATION, QANTAS
AIRWAYS, LTD., SINGAPORE
AIRLINES, LTD., and THAI AIRWAYS
INTERNATIONAL PUBLIC COMPANY,
LTD.,

Defendants.

1 WHEREAS the undersigned plaintiffs have filed the above-captioned case;

2 WHEREAS plaintiffs allege antitrust violations by defendant airlines in the sale of
3 passenger air transportation services containing transpacific flight segments;

4 WHEREAS multiple complaints have been filed to date in federal district courts
5 throughout the United States by plaintiffs purporting to bring class actions on behalf of
6 purchasers of passenger air transportation services containing transpacific flight segments
7 (collectively "the Transpacific Air Passenger cases");

8 WHEREAS, a motion is pending before the Judicial Panel on Multidistrict
9 Litigation to transfer the Transpacific Air Passenger cases to this jurisdiction for
10 coordinated and consolidated pretrial proceedings pursuant to 28 U.S.C. Section 1407;

11 WHEREAS plaintiffs anticipate the possibility of filing a Consolidated Amended
12 Complaint in the Transpacific Air Passenger cases;

13 WHEREAS plaintiffs and All Nippon Airways Co., Ltd. have agreed that an orderly
14 schedule for any response to the pleadings in the Transpacific Air Passenger cases would
15 be more efficient for the parties and for the Court;

16 PURSUANT TO LOCAL RULE 6-1(a), PLAINTIFFS AND DEFENDANT ALL
17 NIPPON AIRWAYS CO., LTD., BY AND THROUGH THEIR RESPECTIVE
18 COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

19 1. The deadline for All Nippon Airways Co., Ltd. to answer, move, or
20 otherwise respond to plaintiffs' Complaint shall be extended until forty-five days after the
21 filing of a Consolidated Amended Complaint in the Transpacific Air Passenger cases, or
22 such other time as the parties may jointly agree in writing;

23 2. This extension is available, without further stipulation with counsel for
24 plaintiffs, to all named defendants who notify plaintiffs in writing of their intention to join
25 this Stipulation; and

26 3. This Stipulation does not constitute a waiver by All Nippon Airways Co.,
27 Ltd., or any other named defendant joining the Stipulation of any defense, including but
28 not limited to the defenses of lack of personal jurisdiction, subject matter jurisdiction,

1 improper venue, sufficiency of process or service of process.

2 IT IS SO STIPULATED.

3
4 DATED: December 19, 2007

5 By:

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22 *Attorneys for Plaintiffs and the Proposed
23 Class*

24
25 DATED: December 18, 2007

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29 *Attorneys for Defendant All Nippon
30 Airways Co., Ltd.*

31 December 20, 2007

